

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
Western Division  
Civil Case No. 5:19-cv-249-Fl**

MATTHEW BRADLEY,  
Plaintiff

v.

ANALYTICAL GRAMMAR, INC.  
Defendant

**STIPULATION AND MOTION FOR  
DISPOSITION OF ALL OUTSTANDING  
CLAIMS AND COUNTERCLAIMS  
[Fed. R. Civ. P. 41(a) and 54]**

Plaintiff and Defendant, having conferred through counsel following the filing of Defendant's motion for entry of judgment and for dismissal [D.E. 66], and bearing in mind the Court's Order and Judgment entered on March 3, 2021 [D.E. 63 and 64], the relative value of the claims at issue in this matter, and the interest of finality, stipulate as follows and request that the Court enter judgment accordingly:

1. Defendant's First Counterclaim, in which Defendant alleged invalidity of Plaintiff's copyright at issue, shall be and is dismissed with prejudice;
2. As to all remaining claims and counterclaims, it shall be ordered that:
  - a. Defendant did not infringe the copyright asserted by Plaintiff in this litigation;  
and
  - b. Defendant did not remove, alter, or falsify copyright management information in connection with the photograph asserted by Plaintiff in this litigation.
3. Final judgment shall be entered in accordance with the foregoing, leaving outstanding only the Court's decision on Defendant's motion for sanctions [D.E. 83].
4. No further motions shall be filed in this case by either party against the other party.  
  
Except as may otherwise be ordered with respect to payments by Richard Liebowitz

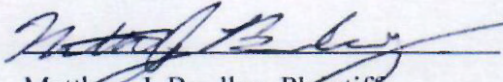


and/or Liebowitz Law Firm, PLLC in the Court's decision on Defendant's  
outstanding motion [D.E. 83], the parties shall bear their own costs.

As indicated by their signatures below, the parties and their counsel consent to the foregoing.

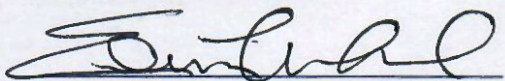
This 16 day of July, 2021, 20th day of July, and 21st day of July, 2021.

**FOR PLAINTIFF:**

  
Matthew J. Bradley, Plaintiff

/s/ Susan Freya Olive  
Susan Freya Olive  
NC Bar No. 7252  
**OLIVE & OLIVE, P.A.**  
Counsel for Plaintiff  
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**FOR DEFENDANT:**

  
Analytical Grammar, Inc., Defendant  
By: Erin Karl, President

/s/ Dan Booth  
Daniel G. Booth  
**DAN BOOTH LAW LLC**  
Counsel for Defendant,  
Local Civil Rule 83.1(e) Special Appearance

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Local Civil Rule 83.1(d)

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Local Civil Rule 83.1(d) Counsel

### **CERTIFICATE OF SERVICE**

Undersigned counsel for Plaintiff certifies that the foregoing document was served this date by electronically filing the same with the Clerk of Court using the CM/ECF System, which will send notification via electronic means to counsel for Defendant and to counsel for Mr. Liebowitz and Liebowitz Law Firm, PLLC, on this 21st day of July, 2021.

/s/ Susan Freya Olive  
Susan Freya Olive  
NC Bar No. 7252  
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